

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

JAMES JOSEPH JULUKE, JR.,)	
an individual,)	
)	Case No.: 3:16-cv-1358-D
Plaintiff,)	
v.)	
)	
L2Y2 LLC,)	
a Texas Limited Liability Company,)	
)	
Defendant.)	
_____)	


STATE OF FLORIDA)	
)	ss.:
COUNTY OF MIAMI-DADE)	

Louis I. Mussman, being duly sworn, deposes and says:


1. I am a member licensed to practice in the State of Florida and am admitted to the Bar of the Northern District of Texas. I am a partner of the firm of Ku & Mussman, P.A., attorney for Plaintiff in the above-entitled action and I am familiar with all the facts and circumstances in this action.
2. I make this affidavit pursuant to Fed. R. Civ. P. 55(a), in support of Plaintiff's request for entry of default against Defendant L2Y2 LLC.
3. This is an action for damages, injunctive relief and attorneys' fees and costs pursuant to Title III of the Americans with Disabilities Act, 42 U.S.C. § 12181 et seq.
4. Jurisdiction of the subject matter of this action is based on 28 U.S.C. §§ 1331 and 1343.

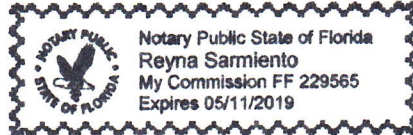
5. This Court has personal jurisdiction over the Defendant.
6. To the best of my knowledge Defendant is not infant or incompetent.
7. This action against Defendant was commenced on May 17, 2016, by the filing of the Complaint. [Dkt. No. 1]. A copy of the summons and complaint was properly served on Defendant L2Y2 LLC on June 22, 2016 and proof of the service was filed with the Court on July 7, 2016. [Dkt. No. 6].
8. On or about June 27, 2016, Plaintiff filed his First Amended Complaint [Dkt. No. 7]. The deadline for Defendant L2Y2 LLC to file its Answer to Plaintiff's First Amended Complaint was August 17, 2016.
9. This action seeks damages, declaratory and injunctive relief to bring the Defendant's property into compliance with the regulations of the ADA, and reasonable attorneys' fees, costs and other expenses of the suit.
10. As the prevailing party, Plaintiff is entitled to have his reasonable attorneys' fees, costs, and litigation expenses reimbursed by L2Y2 LLC pursuant to 42 U.S.C. § 12205.

WHEREFORE, Plaintiff requests the entry of Default against Defendant L2Y2 LLC.


Louis I. Mussman

Sworn to me before this 7th
day of November, 2016.


Notary Public



Personally Known ✓ OR Produced Identification _____
Type of Identification Produced _____